

TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*

-v.-

Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff \_\_\_\_\_ Defendant \_\_\_\_\_ DOJ \_\_\_\_\_

Name: \_\_\_\_\_

Firm Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

INDICATE UPON THE PUBLIC DOCKET SHEET: YES \_\_\_\_\_ NO \_\_\_\_\_

If yes, state description of document to be entered on docket sheet:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**MANDATORY CERTIFICATION OF SERVICE:**

A.) \_\_\_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.) \_\_\_\_\_ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

DATE

SIGNATURE

*Chand Balfour*

**A) If pursuant to a prior Court Order:**

Docket Number of Case in Which Entered: \_\_\_\_\_

Judge/Magistrate Judge: \_\_\_\_\_

Date Entered: \_\_\_\_\_

**B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal**

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.**

10/21/22

DATED: \_\_\_\_\_, NEW YORK

*Andrea Balfour*

**U.S. MAGISTRATE JUDGE**

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_

DATE

**EXHIBIT 2**

UNITED STATES DISTRICT COURT  
for the  
Eastern District of New York

United States of America

v.  
VALERIIA ERMAKOVA

) Case No. 22-MJ-1139  
)

， ) ) ) )

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*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

*(name of person to be arrested)* VALERIIA ERMAKOVA

who is accused of an offense or violation based on the following document filed with the court:

Indictment       Superseding Indictment       Information       Superseding Information       Complaint  
 Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

T. 17, U.S.C., § 506(a)(1)(A) (criminal copyright)

Date: 10/21/2022

Aschtelson

*Issuing officer's signature*

City and state: Brooklyn, New York

Honorable Sanket J. Bulsara

*Printed name and title*

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date:

*Arresting officer's signature*

*Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (name, relation, address, phone number): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (if applicable): \_\_\_\_\_

# UNITED STATES DISTRICT COURT

for the

## Eastern District of New York

United States of America

V.  
ANTON NAPOLSKY,  
also known as "Anton Napolskiy."

)  
)  
)  
)  
)  
)  
)

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*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) ANTON NAPOLSKY, also known as "Anton Napolskiy," ,  
who is accused of an offense or violation based on the following document filed with the court:

Indictment       Superseding Indictment       Information       Superseding Information       Complaint  
 Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

T. 17, U.S.C., § 506(a)(1)(A) (criminal copyright)

Date: 10/21/2022

Ashtulson

*Issuing officer's signature*

City and state: Brooklyn, New York

Honorable Sanket J. Bulsara

*Printed name and title*

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date:

*Arresting officer's signature*

*Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (name, relation, address, phone number): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (if applicable): \_\_\_\_\_

KTF:AFM/CWE/ANR  
F. #2021R01001

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

ANTON NAPOLSKY,  
also known as "Anton Napolskiy,"  
and

VALERIIA ERMAKOVA,

Defendants.

**To Be File Under Seal**

COMPLAINT AND  
AFFIDAVIT IN  
SUPPORT OF AN  
APPLICATION FOR  
TWO ARREST WARRANTS

(T. 17, U.S.C., § 506(a)(1)(A); T. 18, U.S.C.,  
§ 2)

22-MJ-1139

----- X  
EASTERN DISTRICT OF NEW YORK, SS:

Brett Dohnal, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between January 2019 and October 2022, both dates approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTON NAPOLSKY, also known as "Anton Napolskiy," and VALERIIA ERMAKOVA, together with others, did knowingly and willfully infringe a copyright for purposes of commercial advantage and private financial gain, and by the reproduction and distribution during a 180-day period ten or more copies of one or more copyrighted works having a total retail value of more than \$2,500, to wit: the unauthorized sale of copyrighted works in the form of digital books ("ebooks") on Z-Library, a digital piracy website controlled by NAPOLSKY and ERMAKOVA.

(Title 17, United States Code, Section 506(a)(1)(A); Title 18, United States Code, Section 2)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since February 2012. I have extensive experience investigating international crimes, including money laundering and wire fraud, and tracking online subjects who have taken measures to obfuscate who they are and where they are operating. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. I am participating in an investigation of the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA and others who engaged in a scheme to infringe copyrights of published books. The scheme operated through online websites that allow users to fraudulently upload and download the intellectual property of thousands of artists, including artists located within Brooklyn, Queens, and elsewhere throughout the Eastern District of New York. Based on the findings of my investigation, NAPOLSKY and ERMAKOVA are based in Russia.

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware. Where the contents of documents, and the actions, statements and conversations of others are reported, they are in substance and in part, and in approximations, except where otherwise indicated.

## BACKGROUND

### A. Background Regarding Z-Library

3. Z-Library is a website that bills itself as “the world’s largest library” and claims to offer millions of ebooks for download. Z-Library has been active since approximately 2009 and offers copyright-protected ebook files in a variety of file formats and encourages users to upload and download titles.

4. Many of the ebooks offered by Z-Library are protected intellectual property for which authors hold copyrights and publishers hold exclusive distribution rights, and which Z-Library has no right or license to distribute. As such, a central purpose of Z-Library is allowing users to download copyrighted books for free in violation of U.S. copyright law.

5. The copyright crimes perpetrated by the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA through Z-Library described herein have had devastating effects on all manner of victims, including authors, publishers, authors’ estates (including ones which donate their proceeds to charity), independent bookstores, large commercial bookstores, and legitimate ebooks sellers. By making millions of copyrighted works available online for free, while encouraging users to pay for enhanced Z-Library features, Z-Library has robbed individuals of the fruits of their labor—which, for some literary works, represents years or even decades of work—for NAPOLSKY and ERMAKOVA’s personal gain, as described further below.

6. Z-Library consists of dozens of interrelated websites. Its homepage at <https://z-lib.org> displays links to three different domains in the center of the page: “Books” (b-ok.cc), “Articles” (booksc.org), and “Sign In/Up” (singlelogin.org). A screenshot of the homepage for <https://z-lib.org> is below:



7. Z-Library book titles are accessible from United States IP addresses at the site <https://b-ok.cc>, which features a search bar and the covers of “Most Popular” titles. Users can search for books by title, author, ISBN or publisher, and they may also perform full-text searches for words and phrases.

8. Users who visit <https://b-ok.cc> can download a limited number of titles per day without creating a Z-Library account, but certain functions (including the ability to upload new files, request files, and download files in a variety of file formats) are only available to users with a Z-Library account.

9. The domains <https://b-ok.cc> and <https://booksc.org> include “Donate” links in the upper right corner. For a donation of \$1.00 or more, users can upgrade their account to “Premium” status, which unlocks certain features, including the ability to allow users to convert their files to various formats beyond the default format, and access to relevant URLs for downloading purposes. Z-Library accepts payment via Visa, American Express, Alipay, Bitcoin, and Amazon.com gift cards.

10. Z-Library’s collection of titles appears to come from several sources, including its users, who are encouraged to upload new titles. Notably, there are online tutorials

that demonstrate how one can circumvent the copyright protections on proprietary ebook formats (such as Amazon Kindle titles) so that the formerly protected books can be recirculated and uploaded to services like Z-Library.

PROBABLE CAUSE

A. Evidence of the Defendant ANTON NAPOLSKY's Control of Z-Library

11. Records obtained by law enforcement from Google LLC ("Google") and Amazon, Inc. ("Amazon") provide evidence of the defendant ANTON NAPOLSKY's control of Z-Library.

a. Google Records

12. According to Google records, the defendant ANTON NAPOLSKY has an account with Google Pay, Google's proprietary e-payment system. The account is registered in the name "Anton Napolisky" (an alternate transliteration of NAPOLSKY's Cyrillic name) and is associated with the email address Napolisky7@gmail.com.

13. The defendant ANTON NAPOLSKY also appears to control a series of interrelated Z-Library email addresses. Based on my investigation, I know that donation.zlib@gmail.com, zlibdoms@gmail.com and feedback.bookos@gmail.com, are all email addresses used by Z-Library. Specifically, Z-Library has at times requested that donations be sent to variations on the email address donation.zlib@gmail.com. Feedback.bookos@gmail.com is the email address associated with Z-Library in connection with various publicly available records. In addition, the same secondary or backup email address, m-

m@mail.ru (“Napolsky Personal Email-1”)<sup>2</sup> was used to register zlibdoms@gmail.com, Napolsky7@gmail.com, and feedback.bookos@gmail.com.

14. Google records reflect that a Russian-based telephone number ending in - 2458 (“Napolsky Phone-1”) was used to register the email Napolsky7@gmail.com as well as the emails donation.zlib@gmail.com, zlibdoms@gmail.com and feedback.bookos@gmail.com.

15. Google records also reflect that the account associated with the email address feedback.bookos@gmail.com was created with the name “Z-Library Team” and feedback.bookos@gmail.com is the recovery e-mail for the account zlibsupp@gmail.com, which was created with the name “ZLibrary Support.” Similarly, zlibsupp@gmail.com is the recovery e-mail account associated with the email address zlibdonat@gmail.com, that was created with the name “Zlibrary Mailer.”

a. Amazon Records

16. Records obtained by law enforcement from Amazon also provide evidence of the defendant ANTON NAPOLSKY’s control of Z-Library. Specifically, NAPOLSKY is the owner of at least two Amazon.com accounts that are registered in his name, with the phone number as Napolsky Phone-1 and overlapping street addresses (mostly located in Saint Petersburg, Russia). One of the accounts is registered with the email address “amazon@bookmail.org,” and the other account, which is registered with Napolsky Personal Email-1, has a lengthy Amazon order history that includes at least 21 orders that were paid for using Amazon.com gift cards that originated as “donations” by users to Z-Library. Since these

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<sup>2</sup> According to subscription records obtained from Google, Napolsky Personal Email-1 is the email address associated with the Google account registered with the name “Anton Napolsky.”

gift cards were originally donated to Z-Library, their value should only be available to someone who has access to Z-Library's fund of donated Amazon credit.

B. The Defendant ANTON NAPOLSKY Uses Amazon Web Services to Correspond on Behalf of Z-Library

17. Z-Library uses Amazon Web Services ("AWS") Simple Email Service for bookmail.org. According to records obtained by law enforcement from Amazon, the Simple Email Service for @bookmail.org is connected to an AWS Account ending in 4421, which is registered to the customer "Anton Napolisky" at the email address Napolisky Personal Email-1, (the "Napolisky AWS Account").

18. Based on records obtained by law enforcement from AWS, I have observed that the Napolisky AWS Account sent tens of thousands of messages from email addresses at the domain bookmail.org (the domain associated with Z-Library's customer service function) to a widely varying set of what appear to be personal email addresses, located at common personal email domains like gmail.com and aol.com, as well as more than twelve thousand email addresses at ".edu" domains, which generally denote educational institutions. Further, the Napolisky AWS Account also sent emails for account creation purposes and password resets.

19. Some of the email logs that I observed from the Napolisky AWS Account related to messages that were sent out by Z-Library and returned, or "bounced back," by the intended recipient. Such messages generally included the subject line of the original message sent from bookmail.org. Overall, more than 700 of such subject lines contained references to Z-Library, including hundreds of messages with the subject line "Z-Library – confirmation."

20. Dozens of other message subject lines included references to donations.

For example, a message that bounced back on November 27, 2021 had a subject line that included the phrase: “Z-Library (aka b-ok and 1lib) fundraising campaign. Last call (Visa cards are accepted now).”

21. Other messages appeared to reflect automated alerts requested by users about the availability of books in Z-Library’s database. For example, a message that bounced back on November 21, 2021 had the subject line “Z-Library. Notice of appearance of the book.” Another message, which bounced back on November 28, 2021, had the subject line “ZLibrary ZAlerts: new books found.” And a message from November 16, 2021 included the subject line: “Library ZAlerts: new books found on ‘Healing.’”

22. FBI agents, acting in an undercover capacity, have requested copyrighted books from Z-Library using the service’s “send by email” function. The titles arrived, without copyright protections, as attachments to messages from the email address mailer@bookmail.org. Bookmail.org is the domain associated with emails from Z-Library’s customer service personnel.

C. Evidence of the Defendant VALERIIA ERMAKOVA’s Control of Z-Library

23. Evidence also establishes the defendant VALERIIA ERMAKOVA’s control of Z-Library and her association with the defendant ANTON NAPOLSKY.

24. Based on my investigation, I understand that an Amazon gift card donation was made to Z-Library in or around January 2021 (the “Donation”). In response, the individual who made the Donation received an email message from the account zlibsupp@gmail.com that stated, in sum and substance, that the card had been received.

25. According to records obtained by law enforcement from Amazon, the Donation was claimed by an Amazon customer account ending in -1502 (the “1502 Account”),

registered to customer “Valeria” at email address kawaiihito22@gmail.com (“Ermakova Personal Email-1”). The account was registered on November 30, 2018, and has payment methods on file, including a Visa and a Mastercard in the name of Ermakova Valeriya<sup>3</sup> with the billing address for each of Fontanka River Embankment 24 18, St. Petersburg, Russia. Additionally, there is a Mastercard in NAPOLSKY’s name on the 1502 Account with a billing address in New Castle, Delaware. Based on an open-source search, it appears that the address is registered to a shipping company that provides mail forwarding services.

26. Since March 20, 2019, the 1502 Account has placed more than 110 orders totaling over \$13,628.32, most of them for beauty and apparel products. The recipients of the gift cards have various email addresses, but many of the email addresses follow the naming convention “zlibdonat+[numbers]@gmail.com” or are registered to the domain “@bookmail.org,” indicating that they were likely “donated” by Z-Library users. Of the 110 orders on the account associated with Z-library “donated” gift cards, over 100 were shipped to “Valeriya Ermakova” or “Valeriya Yermakova” at the address Fontanka River embankment, St. Petersburg, Russia. Since these gift cards were originally donated to Z-Library, their value should only be available to someone who has access to Z-Library’s fund of donated Amazon credit.

27. Based on subscription records obtained by law enforcement from Google, the Google account associated with Ermakova Personal Email-1 logged on numerous times from IP addresses that were also used to log into the accounts associated with the email addresses zlibsupp@gmail.com and feedback.bookos@gmail.com, indicating that a single internet access

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<sup>3</sup> I believe, based on what I have learned in this investigation, that “Valeriya Ermakova” is the defendant VALERIIA ERMAKOVA and that ERMAKOVA uses slightly different spellings of her name.

point (such as a home or business internet connection) was used to log in to all three accounts.

For example, each of the accounts logged in from the IP address 5.8.39.0 as indicated below:

Account	Time Stamp
feedback.bookos@gmail.com	10/27/2021 8:48:31 AM
zlibsupp@gmail.com	10/27/2021 8:55:31 AM
Ermakova Personal Email-1	10/27/2021 8:55:31 AM
zlibsupp@gmail.com	10/27/2021 8:55:31 AM
feedback.bookos@gmail.com	10/30/2021 9:49:14 PM
zlibsupp@gmail.com	10/30/2021 9:49:39 PM
Ermakova Personal Email-1	10/30/2021 9:49:39 PM
Ermakova Personal Email-1	10/31/2021 8:58:57 AM
zlibsupp@gmail.com	10/31/2021 8:58:58 AM
Ermakova Personal Email-1	11/3/2021 3:33:39 PM
zlibsupp@gmail.com	11/3/2021 3:33:36 PM
Ermakova Personal Email-1	11/6/2021 11:13:14 AM
zlibsupp@gmail.com	11/6/2021 11:13:15 AM
Ermakova Personal Email-1	11/7/2021 8:23:02 PM
zlibsupp@gmail.com	11/7/2021 8:23:03 PM

28. Additionally, according to records received from AWS, both the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA logged on to their respective AWS account and made Amazon orders from the IP Address 5.8.39.0 interchangeably and sometimes around the same time. For example, on November 14, 2020, NAPOLSKY and ERMAKOVA logged on to their respective AWS account from the above-referenced IP Address within approximately 26 minutes of each other and on February 6, 2021, NAPOLSKY and ERMAKOVA logged on to their respective AWS account a few hours apart.

**D. Evidence of the Defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA's Control Over Z-Library and Their Collaboration**

29. Based on records received from Google, including a search warrant for the accounts Ermakova Personal Email-1 and Napsky Personal Email-1 signed by the Honorable Vera M. Scanlon, United States Magistrate Judge, Eastern District of New York, law

enforcement has identified communications that show the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA's interactions with each other and Z-Library. See Magistrate Docket Number 22-936. Some of these communications are excepted below:

- a. On or about November 28, 2014, Napolisky Personal Email-1 received an email from adwords-noreply@google.com that was also received by support.wikilife@gmail.com and feedback.bookos@gmail.com. Google Ads (formerly Google Adwords) is an online advertising platform developed by Google, where advertisers bid to display brief advertisements, service offerings, product listings, or videos to web users. It can place ads both in the results of search engines like Google Search and on non-search websites, mobile apps, and video. This email indicates that the defendant ANTON NAPOLSKY was using the services of Google Adwords to advertise Z-Library, as excerpted below.

 **Email Message**

From: "Google AdWords" adwords-noreply@google.com  
To: m-m@mail.ru, support.wikilife@gmail.com  
Received (GMT): 11/28/2014 08:17:48  
Subject: Your AdWords account: Ads won't show due to a violation of the Ads Policy

Plain Text Body

Client ID: 724-198-9076

Hello!

One of your sites doesn't comply with our Advertising Policies AdWords. Therefore, we cannot show existing ones and will Reject new ads with a link to this site.

to resolve this issue and resume running ads follow these steps actions:

1. Make the necessary changes on the site below, which is not Complies with AdWords policies.

Display URL: bookos.org.

Policy violation: malware

Details and instructions:

<https://support.google.com/adwordspolicy/answer/1308246?hl=ru#fix>

2. Submit a request to re-check the site, following the instructions for see the link above. If we don't find any violations of AdWords policies on your site, it does will be approved.

b. On or about January 23, 2020, Napolsky Personal Email-1 received an email addressed to "Anton N." from an internet domain service company with an invoice for renewing booksc.org for one year. An excerpt of the email is depicted below.

 **Email Message**

From: "Internet.bs" no-reply@support.internet.bs  
 To: m-m@mail.ru  
 CC: napolsky7@yandex.ru  
 Received (GMT): 01/23/2020 09:26:01  
 Subject: Invoice 5996687

Html Body

Dear Anton N,

Please find here your Invoice:

Internet Domain Service BS Corp. Ocean Centre, Montague Foreshore East Bay Street, P.O. Box SS-19084 Nassau, Bahamas VAT Number: GB190030448	Books Bay 1st beach miami, 123456 miami DOMINICAN REPUBLIC
January 23, 2020- Invoice 5996687	
Product	Price
1) Renewal: booksc.org (1 year)	\$12.29

c. On or about June 12, 2019 and August 17, 2019, the email accounts admin@bookmail.org and feedback.bookos@gmail.com received emails from the email address jira@zlibrary.atlassian.net. Similarly, on or about January 10, 2022, January 14, 2022 and March 22, 2022, Ermakova Personal Email-1 received emails from the email address jira@zlibrary.atlassian.net. Atlassian Corporation Plc is an Australian software company that develops products for software developers, project managers and other software development teams, including a task management program called Jira. Updates regarding a Jira project are sent out to team members from a central, automated email account. The receipt of

these emails indicates that the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA were collaborating regarding Z-Library software, and that Z-Library had an account with Atlassian Corporation Plc. Translated excerpts of the emails to Ermakova Personal Email-1 are below and indicate that the tasks ERMAKOVA requested were completed by individuals working with ERMAKOVA and NAPOLSKY.<sup>4</sup>

 **Email Message**

From: "Daniil Yegorov (Jira)" jira@zlibrary.atlassian.net  
 To: "Валерия Ермакова" kawaiihito22@gmail.com  
 Received (GMT): 01/10/2022 17:41:20  
 Subject: [JIRA] Daniil Yegorov mentioned you on ZLIB-2148

[Plain Text Body](#) [Html Body](#)

Daniil Yegorov mentioned you on an issue

ZLibrary / ZLIB-2148

**Add the ability for an admin to delete a collection of books downloaded by users in their entirety**

Daniil Yegorov 8:41 PM MSK

@Valeria Ermakova , done!

The data was indeed stopped being written because a new field was added to the table. The save was corrected, the missing data was recalculated.

Filter by user added (only now) as a search by user login. If you wish, I can change to search by mail or user id.

Solution reference: <https://stage13.book4you.org/uploader/collections.php> (stage 13)

Important: now all the new functionality (search by user and mark are available only to admins.

[View issue](#)

 **Email Message**

From: "Daniil Yegorov (Jira)" jira@zlibrary.atlassian.net  
 To: "Валерия Ермакова" kawaiihito22@gmail.com  
 Received (GMT): 01/14/2022 16:45:59  
 Subject: [JIRA] Daniil Yegorov mentioned you on ZLIB-2148

[Plain Text Body](#) [Html Body](#)

Daniil Yegorov mentioned you on an issue

ZLibrary / ZLIB-2148

**Add the ability for an admin to delete a collection of entire books uploaded by users**

Daniil Yegorov 7:45 PM MSK

@Valeria Ermakova , yes, the search was by login (for example, <https://stage13.book4you.org/uploader/collections.php?user=kangaringo> , there are my test collections, you can try to mark them as spam and then delete).

Redesigned the search, now collections can be searched by id user (fastest), as well as by name and email .

Removed the spam flag)

[View issue](#)

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<sup>4</sup> The translations contained herein are drafts.

**Email Message**

From: "Alexey Zhukov (Jira)" jira@zlibrary.atlassian.net  
 To: "Valeria Ermakova" kawaiihito22@gmail.com  
 Received (GMT): 03/22/2022 05:19:12  
 Subject: [JIRA] Alexey Zhukov mentioned you on ZLIB-1307

**Plain Text Body****Html Body**

Alexey Zhukov mentioned you on an issue

ZLibrary / ZLIB-1307

**Implement the ability to specify the preferred format of the book file name**

✉ Alexey Zhukov 8:19 AM MSK

✉ Valeria Ermakova A space is added after the tag in the input field so that you can see the cursor behind the tag (because there is no standardized behavior as browsers have to display the cursor next to the tag and they do it very differently).

In the displayed example and in the saved template, these spaces are removed, i.e. it is just a small trick to display in the input field.

**View issue**

d. On or about October 25, 2018, Napolisky Personal Email-1 received an email from Ermakova Personal Email-1 attaching what appears to be an electronic version of the book “Dare to Lead: Brave Work. Tough Conversations. Whole Hearts,” depicted below.

**null**

**Time** 2018-10-25T14:34:16-04:00  
**From** kawaiihito22@gmail.com  
**To** m-m@mail.ru  
**CC**  
**BCC**

**Attachments** Dare To Lead\_ Brave Work. Tough Conversations. Whole Hearts. — Brené Brown (2018).epub

WHEREFORE, your deponent respectfully requests that the defendants ANTON NAPOLSKY and VALERIIA ERMAKOVA be dealt with according to law.

It is further requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrants. I believe that sealing this document is necessary because the warrant is relevant to an ongoing investigation and, based upon my training and experience, I have learned that criminals actively search for criminal affidavits and warrants via the internet, and disseminate them to others as they deem appropriate, e.g., by posting them publicly online. Premature disclosure of

the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness, particularly given the defendants' location overseas.

*Brett Dohnal*

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Brett Dohnal  
Special Agent  
Federal Bureau of Investigation

Sworn to me through the transmission of this  
Affidavit by reliable electronic means, pursuant to  
Federal Rules of Criminal Procedure 41(d)(3) and 4.1, this  
21st of October, 2022

*Sanket J. Bulsara*

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THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

KTF:AFM/CWE/ANR  
F.#2021R01001

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

**TO BE FILED UNDER SEAL**

- against -

**APPLICATION FOR SEALING  
AND LIMITED UNSEALING ORDER**

ANTON NAPOLSKY,  
also known as "Anton Napolskiy,"

22-MJ-1139

and

VALERIIA ERMAKOVA,

Defendants.

-----X

1. On October 21, 2022, Magistrate Judge Sanket J. Bulsara signed a complaint and arrest warrants for the above-captioned defendants, certain of whom are currently at-large outside the United States. Should any of these defendants be arrested overseas, the government may seek extradition or expulsion from a third country into the United States. Unless and until extradition or expulsion is ordered, there is a possibility that the defendants may seek to flee to a foreign jurisdiction outside of the reach of the United States government. Accordingly, Judge Bulsara granted the government's request for the complaint and arrest warrants in this matter to be filed under seal.

2. The government hereby respectfully moves to unseal the complaint and arrest warrants for the limited purposes of disseminating the complaint and arrest warrants to law enforcement personnel, including foreign law authorities and authorities in a foreign Ministry of

Justice, as well as the U.S. Department of State, in connection with efforts to prosecute the defendants or to secure their arrests, extraditions or expulsions, and to provide the complaint to the defendants and their counsel subsequent to arrest. The government requests that the complaint and arrest warrants otherwise remain under seal.

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

By:

CHAND EDWARDS-BALFOUR

Digitally signed by CHAND  
EDWARDS-BALFOUR  
Date: 2022.10.21 09:21:51  
-04'00'

Chand W. Edwards-Balfour  
Assistant U.S. Attorney  
(718) 254-6238

Dated: October 21, 2022  
Brooklyn, New York

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

**TO BE FILED UNDER SEAL**

- against -

ANTON NAPOLSKY,  
also known as "Anton Napolskiy,"

**SEALING AND  
LIMITED UNSEALING ORDER**

22-MJ-1139

and

VALERIIA ERMAKOVA,

Defendants.

-----X

Upon consideration of the motion filed by the United States of America by Assistant United States Attorney Chand W. Edwards-Balfour, for an Order to seal the above-captioned complaint and arrest warrants, and unseal the complaint and arrest warrants for the limited purposes of disseminating the complaint and arrest warrants to law enforcement personnel, including foreign authorities, in connection with efforts to prosecute the defendants or secure their arrests, extraditions or expulsions, and to provide the complaint and arrest warrants to the defendant and defense counsel,

IT IS HEREBY ORDERED that the complaint and arrest warrants in this matter be sealed

IT IS FURTHER ORDERED that the complaint and arrest warrants be unsealed for the limited purposes of disseminating the complaint and arrest warrants to law enforcement personnel, including foreign law authorities and authorities in a foreign Ministry of Justice, as

well as the U.S. Department of State, in connection with the efforts to prosecute the defendants or secure their provisional arrests, extraditions or expulsions, and to provide the complaint and arrest warrant to the defendants and their counsel subsequent to arrest. The complaint and arrest warrants will otherwise remain under seal.



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HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

Dated: October 21, 2022  
Brooklyn, New York